Duane C. Miller #57812 Michael D. Axline, #229840 A. Curtis Sawyer, Jr. #101324 Justin Massey #229697 (Exempt from filing fees per Govt. Code § 6103) MILLER, AXLINE & SAWYER 3 1050 Fulton Avenue, Suite 100 Sacramento, California 95815 Telephone: (916) 488-6688 Facsimile: (916) 488-4288 4 5 Edmond M. Connor, #65515 6 CONNOR, FLETCHER & WILLIAMS LLP 2211 Michelson Drive, Suite 1100 Irvine, CA 92612 Telephone: (949) 622-2600 Facsimile: (949) 622-2626 9 Attorneys for Plaintiff 10 Orange County Water District 11 12 SUPERIOR COURT OF THE STATE OF CALIFORNIA 13 IN AND FOR THE COUNTY OF ORANGE 14 15 NO. 04CC00715 ORANGE COUNTY WATER DISTRICT, 16 STIPULATION REGARDING USE AND Plaintiff, 17 OCCUPANCY OF PROPERTY 18 (NORTHROP GRUMMEN SYSTEMS CORPORATION) 19 NORTHROP CORPORATION; et al., 20 Defendants. Dept: CX104 Judge: Hon. Kim G. Dunning 21 AND RELATED CROSS-ACTIONS 22 Complaint Filed: December 17, 2004 Trial Date: February 10, 2012 23 24 25 26 27 28

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Stipulation Regarding Use and Ownership of Property

NORTHROP ELECTROTECHNICAL DIVISION

Northrop Grumman Systems Corporation (NGSC), admits that it owned the property located at 500 East Orangethorpe between 1952 and 1995.

NGSC admits that it occupied the property located at 500 East Orangethorpe between 1951 and 1989.

NGSC admits that it used trichloroethene (TCE) in activities conducted on the property located at 500 East Orangethorpe.

NGSC admits that it used 1,1-dichloroethene (1,1-DCE) in activities conducted on the property located at 500 East Orangethorpe.

NGSC admits that it used 1,1,1-trichloroethane (1,1,1-TCA) in activities conducted on the property located at 500 East Orangethorpe.

NGSC admits that it released 1,1,1-trichloroethane (1,1,1-TCA) into the soil at 500 East Orangethorpe, to the extent there was a reported release in 1986.

NGSC admits that it leased the property located at 301 East Orangethorpe between 1962 and 1992.

NGSC admits that it owned the property located at 301 East Orangethorpe between 1992 and 1996. $^{5}\mu^{\gamma}$

NGSC admits that it occupied the property located at 301 East Orangethorpe between 1962 and 1994.

NGSC admits that it used trichloroethene (TCE) in activities conducted on the property located at 301 East Orangethorpe.

NGSC admits that it used 1,1,1-trichloroethane (1,1,1-TCA) in activities conducted on the property located at 301 East Orangethorpe.

NGSC admits that it used compounds containing methylene chloride in activities conducted on the property located at 301 East Orangethorpe.

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NGSC admits that it used 1,1-dichloroethene (1,1-DCE) in activities conducted on the property located at 500 East Orangethorpe.

NGSC admits that it used 1,1,1-trichloroethane (1,1,1-TCA) in activities conducted on the property located at 500 East Orangethorpe.

NGSC admits that it released 1,1,1-trichloroethane (1,1,1-TCA) into the soil at 500 East Orangethorpe, to the extent there was a reported release in 1986.

NGSC admits that it leased the property located at 301 East Orangethorpe between 1962 and 1992.

NGSC admits that it owned the property located at 301 East Orangethorpe between 1992 and 1998. M

NGSC admits that it occupied the property located at 301 East Orangethorpe between 1962 and 1994.

NGSC admits that it used trichloroethene (TCE) in activities conducted on the property located at 301 East Orangethorpe.

NGSC admits that it used 1,1,1-trichloroethane (1,1,1-TCA) in activities conducted on the property located at 301 East Orangethorpe.

NGSC admits that it used compounds containing methylene chloride in activities conducted on the property located at 301 East Orangethorpe.

IT IS SO STIPULATED.

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2	Dated: 6/22/13	÷	MILLER, AXLINE & SAWYER A Professional Corporation
3	. / /		
4		Ву	MICHAEL AXLINE
5			Attorneys for Plaintiff Orange County Water District
6	Dated: 6 22 17		LEWIS, BRISBOIS, BISGAARD & SMITH
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8			MAnt
9		By:	
10			BOB SMITH, ESQ. Attorneys for Northrop Grummen Systems Corporation
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